

Dear Sir

While in general agreement with your proposed modifications to the Haringey Core Strategy (“CS”), I would like to make the following two comments, which are based on the assumption that the proposed modifications should accurately reflect (i) Haringey’s Unitary Development Plan (“UDP”) and (ii) the conclusions reached in the Examination in Public (“EIP”) on 22 February this year.

1. As you may have guessed, my concerns relate principally to the Pinkham Way site. Given the controversy surrounding the site, I would suggest that your modifications to the CS are a valuable opportunity to confirm the Council’s position on the site as given in the UDP and the EIP.

The UDP states that Pinkham Way is a Grade 1 Ecologically Valuable Site and thus a Site of Importance for Nature Conservation. In Schedule 1, the UDP states that the site should be used only for “Employment generating uses subject to no adverse effect on the nature conservation value of the site”.

This is a stricter test than for SINC’s generally, and therefore general comments about development on SINC’s will fail to take it into account. I would therefore request an addition to SP13 along the following lines:

“The Council will permit development on SINC’s and LNR’s only if the proposed development would have no adverse effect on the nature conservation value of the site in question or, if it would have an adverse effect, then only if the importance of the development outweighed the nature conservation value of the site. The exception to this is the site of the former Friern Barnet Sewage Works (Pinkham Way): the Council has stated in the UDP that it will allow development on this site only if the proposed development would have no adverse effect on the nature conservation value of the site”.

I would also request that paragraph 6.3.23 is amended along the following lines, both to emphasise the sentiment in the UDP, and also to take the opportunity explicitly to point out that Pinkham Way is an SINC (and is linked geographically with others):

“SINC’s within the borough include Bluebell Wood, Muswell Hill Golf Course and the former Friern Barnet Sewage Works (Pinkham Way), Tottenham Cemetery and Bruce Castle Park. The Council will not permit development on SINC’s or LNR’s unless the proposed development would have no adverse effect on the nature conservation value of the site in question or, if it would have an adverse effect, then only in exceptional circumstances and if the importance of the development outweighed the nature conservation value of the site.”

2. At the EIP Haringey Council confirmed that Pinkham Way was not an established industrial site. It is therefore not a Locally Significant Industrial Site (“LSIS”), (as Haringey Council attempted to define it in its Schedule of Focussed Changes in November 2010 – and I (and many others) are grateful that you required the Council to explain their reasons for their proposed change to the designation.)

I would therefore welcome a statement in your report that the site is open space and that it is not brownfield land or previously developed land because it is excluded from this definition under the London Plan and the NPPF definitions of previously developed land. Evidence was produced to support that at the EiP which was not disputed by the Council.

Proposal Maps 7, 16 and 24 need changing to reflect your decision not to permit the redesignation to LSIS.

Yours sincerely

Guy Abrahams